

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CAPREF LLOYD CENTER EAST, LLC¹

Debtor.

Chapter 11

Case No. 23-11942 (JTD)

**NOTICE OF FILING OF CHAPTER 11 PETITION
AND RELATED MOTIONS AND DECLARATION**

PLEASE TAKE NOTICE that on December 4, CAPREF Lloyd Center East, LLC (the “Debtor”), filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

A. VOLUNTARY CHAPTER 11 PETITION

1. CAPREF Lloyd Center East, LLC [(Case No. 23-11942) [Docket No. 1; filed December 4, 2023]

B. FIRST DAY DECLARATION

2. Declaration of Todd Minnis in Support of Chapter 11 Petition and Certain First Day Motions [Docket No. 3; filed December 4, 2023]

C. FIRST DAY MOTIONS

3. Motion Pursuant to Sections 105 And 366 of the Bankruptcy Code for Entry of Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtor and (II) Determining that the Utility Companies Are Adequately Assured of Post-Petition Payment [Docket 4; filed December 4, 2023]
4. Debtor's Motion Pursuant to Sections 105(a), 362(d), 363(b), 363(c), and 503(b) of the Bankruptcy Code for an Order Authorizing the Debtor to Continue Commercial Property Insurance and Pay Related Obligations [Docket No. 5; filed December 4, 2023]
5. Motion of the Debtor for Interim and Final Orders: (I) Approving the Continued Use of the Debtor's Cash Management System, and Bank Account; (II) Extending the Debtor's Time to Comply with Section 345(B) of The Bankruptcy Code; and (III) Granting Related Relief [Docket 6; filed December 4, 2023]

¹ The Debtor in this case, along with the last four digits of its federal tax identification number, is: CAPREF Lloyd Center East, LLC (1920) and the location of its service address in this chapter 11 case is: 4514 Travis Street, Suite 208, Dallas, TX 75205.

6. Debtor's Motion for Approval of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay and (V) Scheduling A Final Hearing [Docket No. 7; filed December 4, 2023]

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Motions (the "First Day Hearing") is scheduled for **December 6, 2023 at 3:00 p.m. (ET)** and will be held before the Honorable Judge John T. Dorsey, United States Bankruptcy Judge, at which time the Court may grant any and all of the First Day Motions without further notice.

PLEASE TAKE FURTHER NOTICE that the First Day Hearing will be conducted entirely by Zoom and requires all participants to register in advance pursuant to the instruction to be set forth in the agenda for the First Day Hearing.

PLEASE TAKE FURTHER NOTICE that if you would like to receive copies of any of the documents referenced above prior to the First Day Hearing, copies may be obtained from the website of the United States Bankruptcy Court for the District of Delaware www.deb.uscourts.gov for a fee.

Dated: December 5, 2023
Wilmington, Delaware

ASHBY & GEDDES, P.A.

/s/ Gregory A. Taylor

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